
**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT APPLIES TO:

Plaintiff's Master Administrative Long-Form
Complaint and:

Plaintiff Eric Downing

**PETITION TO ESTABLISH
ATTORNEY'S LIEN**

Comes now Petitioners, Attorney Robins Cloud, LLP, pursuant to an executed Agreement for Legal Services come now and states as follows:

1. Petitioners are attorneys at law admitted to practice before the courts of Texas, and file this Petition to establish a lien for attorney's fees as set forth hereinafter.
2. On or about September 18, 2015, Petitioners, Robins Cloud, LLP, were retained and employed by the Plaintiff, Eric Downing, pursuant to an agreement for legal services, to pursue a claim for injuries and damages allegedly caused by the National Football League's conduct associated with football-related concussions, head, and brain injuries.
3. The specifics of the agreement for legal services are as follows: If no recovery (by settlement or trial) is obtained, client will not owe a legal fee. If Attorney Robins Cloud,

LLP, obtains a settlement or judgment for Client, Client will pay to the Petitioners thirty three and one third percent (33 1/3%) of the gross recovery plus reimbursement of expenses.

4. From the date the Petitioner was authorized to proceed on behalf of the Plaintiff, the Petitioner has actively and diligently investigated, prepared, and pursued Plaintiff's claims, and has taken all steps necessary to prosecute those claims, including, but not limited to, correspondence and communication with the client, preparation and review of client's factual and legal circumstances, retaining experts, drafting and providing client updates, analyzing Plaintiff's medical status and need for medical testing, and scheduling and paying for an exam by a neuropsychologist and neurologist. Petitioner has incurred \$17,956.41 in expenses directly related to Plaintiff's claim.
5. The Plaintiff's discharged the Petitioners as his attorney in this matter, and has hired another attorney in this action.
6. Petitioners were not terminated due to any malfeasance or other improper action.
7. The Petitioners claim the right to have a lien for attorney's fees and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiff in this action.

WHEREFORE, the Petitioners pray:

1. That an attorney's lien for fees and expenses be established;
2. That the amount of the lien be determined;
3. That the Court order that Petitioner be entitled to enforce an attorney's lien against the proceeds to be derived from any settlement or judgment in this action;

4. That the Defendant or the Defendant's insurer be prohibited from paying to the Plaintiff any sums of money until said lien has been satisfied; and
5. For such other further relief as this Court deems just.

Dated: June 28, 2018

Respectfully submitted,

Attorney Ian Cloud, Robins Cloud, LLP

By: /s/ Ian P. Cloud

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on this date, a copy of the foregoing Notice of Change of Firm Affiliation was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system as indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

Dated: June 28, 2018

/s/ Ian P. Cloud

Ian P. Cloud